



Womble Bond Dickinson (US) LLP

1313 North Market Street
Suite 1200
Wilmington, DE 19801t: 302.252.4320
f: 302.252.4330Kevin J. Mangan
Partner
Direct Dial: 302-252-4361
Direct Fax: 302-661-7729
E-mail: Kevin.Mangan@wbd-us.com

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The Honorable Leonard P. Stark
United States District Court
District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, Delaware 19801**Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, Case No. 17-mc-151**

Dear Judge Stark,

On behalf of our client, Gold Reserve Ltd., we respectfully request that the Court allow Gold Reserve to file one consolidated reply brief of 25 pages or less in support of its Motion to Strike Special Master's Notice of Determination of Superior Proposal (D.I. 2117). Gold Reserve believes it more efficient to file one consolidated reply rather than multiple separate replies to the six (6) separate responses in opposition (D.I. nos. 2169, 2170, 2171, 2172, 2174, and 2176) that were filed by the Special Master, Crystallex, ConocoPhillips, OIEG, Red Tree/ACLI, and Elliott/Amber Energy. Those responses in opposition make related but distinct argument and total 50 pages of argument.

The Court's Scheduling Order entered August 22, 2025 (DI 2110) addressed briefing. Paragraph 7 indicates that "any further opening or response briefs filed in this matter shall not exceed twenty (20) pages and any reply briefs shall not exceed ten (10) pages." The opposing parties could have combined their efforts and filed a single twenty (20) page opposition brief, but they did not. Gold Reserve understands therefore that it has the right to reply separately to each opposition. However, rather than file six separate replies, Gold Reserve prepared a consolidated reply that is under 25 pages in length and therefore observes the proportions established by the Court.

Gold Reserve sought consent from the opposing parties to confirm that they agreed with this approach, but those that have responded did not consent – instead taking the position that Gold Reserve should be limited to a single ten (10) page reply brief.

To the extent Gold Reserve misunderstood the Court's order, it respectfully requests that the Court permit it to file one consolidated reply brief of 25 pages, as this is the amount of pages required to reply to the 50 pages of argument made in the six opposition briefs.

Respectfully submitted,

Womble Bond Dickinson (US) LLP

/s/ Kevin J. Mangan

Kevin J. Mangan

Matthew H. Kirtland (admitted *pro hac vice*)

Norton Rose Fulbright US LLP

799 9th Street NW, Suite 1000

Washington, DC 20001

Telephone: 202-662-0200

matthew.kirtland@nortonrosefulbright.com

cc: Counsel of Record (via ECF)